

# Exhibit A

Jan. 9. 2018 7:12PM

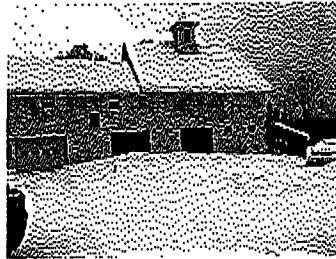
No. 2000 P. 1

**APPLICATION FOR SEARCH WARRANT WITH AFFIDAVIT**  
**Case # 18A400165**

**A. APPLICATION**

Detective Sergeant Denis Girouard requests the Honorable Judge Thomas Devine to issue a warrant to search:

884 Hawkins Road in Danville Vermont, a two-story wood constructed single family home that is white in color, attached barn with 3 bay doors as well as garage and wood shed located directly across from the residence on the opposite side of Hawkins Road as well as any other out buildings associated with the property, rented by Greg C. Davis and Melissa L. Davis



Vehicle 1: 2012 Dodge Durango bearing Vermont registration GHD103 VIN: 1C4RDJAG5CC100742 registered to Greg Davis

for the following property or object(s):

1. Any and all documents or records related to investing and personal banking, including but not limited to Oil/Gas investing, by Greg Davis, such as receipts, logs, transactions; notes, correspondence, financial institution information, contacts, names and contact information in any form including, digital form on computer, electronic devices and cell phones,.
2. Any biological fluids, blood, DNA, hairs and fibers for possible comparison.
3. Any routers or other devices which have WIFI/internet capabilities

and if such property or object be found there, to seize it, prepare a written inventory of it, and promptly return the inventory to the Superior Court of Vermont Criminal Division, Caledonia Unit Criminal Division.

The applicant has probable cause to believe that such property or object(s) will be found in such premises and will constitute:

Evidence for the crime of Murder, which is a violation of Title 13 VSA 2301.

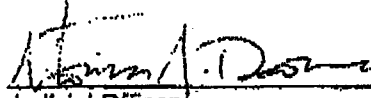
For the purposes of establishing probable cause for issuance of this warrant, there are attached hereto the following affidavits:

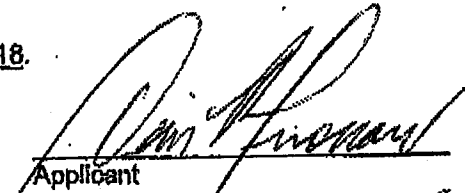
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A: Affidavit of Detective Sergeant Denis Girouard

This application is made on this 8<sup>th</sup> day of January, 2018.

  
Judicial Officer

  
Applicant

1-8-18  
1901 hours

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**SEARCH WARRANT  
Case # 18A400165****STATE OF VERMONT****COUNTY OF CALEDONIA, ss.****TO: Det. Sgt. Denis Girouard or any Vermont or Federal Law Enforcement Officer.**

You are hereby commanded to search:

884 Hawkins Road in Danville Vermont, a two-story wood constructed single family home that is white in color, attached barn with 3 bay doors as well as garage and wood shed located directly across from the residence on the opposite side of Hawkins Road as well as any other out buildings associated with the property, rented by Greg C. Davis and Melissa L. Davis



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for the following property or object(s):

4. Any and all documents or records related to investing and personal banking, including but not limited to Oil/Gas investing, by Greg Davis, such as receipts, logs, transactions, notes, correspondence, financial institution information, contacts, names and contact information in any form including, digital form on computer, electronic devices and cell phones,.
5. Any biological fluids, blood, DNA, hairs and fibers for possible comparison.
6. Any routers or other devices which have WIFI/internet capabilities

The applicant has probable cause to believe that such property or object(s) will be found in such premises and will constitute:  
Evidence for the crime of Murder, which is a violation of Title 13 VSA 2301.

serving this warrant and making the search (between the hours of 6:00 a.m. and 10:00 p.m.) – (exception \_\_\_\_\_) within 20 days from the date hereof, and if the property or object(s) be found there, to seize it, prepare a written inventory of it, and bring such property, object(s) or inventory before the Superior Court of Vermont Criminal Division, Caledonia Unit Caledonia Criminal Division. This warrant is issued upon the basis of an affidavit and finding of probable cause by me, filed with the clerk of that unit.

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Dated at St. Johnsbury, County of Caledonia this 8<sup>th</sup> day of January, 2018.

Monica Davis  
Judicial Officer

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No. 2000 P. 5



**AFFIDAVIT OF SERGEANT DENIS P. GIROUARD  
VERMONT STATE POLICE  
STATE OF VERMONT  
CALEDONIA COUNTY, ss.  
CASE # 18A400165**



**NOW COMES** Det. Sgt. Denis P. Girouard, affiant(s), being duly sworn and on oath, deposes and says he has probable cause for issuance of a search warrant based on the following:

1. The undersigned being duly sworn, deposes and says that I, Det. Sgt. Denis P. Girouard am now and have been a police officer in the State of Vermont Since January of 1994. I am currently a full-time employce of the Vermont State Police, being presently assigned to the Vermont State Police Major Crime Unit as a Detective Sergeant.
2. I am presently assigned to the Bureau of Criminal Investigation Major Crime Unit, and am often called to investigate serious felony crimes. I have investigated and processed numerous serious and violent crimes, including homicides.
3. On January 7, 2018, I was advised by Lieutenant Todd Baxter to respond to a homicide in Ryegate, Vermont. Lt. Baxter contacted me while I was en-route and advised me to meet him at the scene. I responded to the scene. The scene was located on the Peacham Road in Barnet, Vermont approximately ½ mile south of Gadley Road. The body was located at a pull off area on the west side of the Peacham Road. At the time of my response, it was very cold out and there was a plowed snow bank on the west side of the pull off.
4. As I walked near the scene, I observed a body located near the base of the snow bank on the west side of the pull off. I observed a heavy style-hiking boot on the feet of the body. The body was oriented north and south, with the head towards the north. The body was face down and was partially covered in snow. The head of the body was covered by snow.
5. Trooper Upson advised me he spoke with the complainant who was identified as Christopher Despins DOB: 6/12/70. Trooper Upson advised that Despins told him that he and his wife, Sarah Despins DOB: 6/7/78 were traveling south on the Groton Road when they thought they saw a body lying in the pull-off. Despins advised they turned around and drove into the pull off and stopped. Despins advised his wife got out of the car and walked over to the body and lifted up a chunk of snow and saw blood. Despins advised after his wife returned to the car they traveled a short distance north to get cell reception where they placed the call to 911. The Peacham Road in Barnet Vermont turns into the Groton Road.

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6. Trooper Upson also spoke with Sarah Despins DOB: 6/7/78 in his cruiser. Trooper Upson advised Sarah was visibly shaken. Trooper Upson advised Sarah hoped it was a prank and it was not actually a body. Trooper Upson said Sarah sat in his cruiser and provided a statement consistent with her husband.
7. I spoke with Mark Chasc DOB: 9/27/68 who is the Barnet road supervisor. Chasc told me that this pull off was along his route and the last time it was plowed was on Friday. Chasc told me that the road crew from Ryegate uses this pull off as well. Chasc said they might have been out for snowdrifts this weekend.
8. I telephoned Ryegate road crew supervisor Nelson Elder DOB: 5/21/80. Elder told me that this pull off is along his route and the last time the crew plowed was Saturday morning to take care of snow drifts. He said they were only out until around 9:30 in the morning. Elder said he did go through the pull off but could not recall if he dropped the plow. Elder said he did not see anything suspicious when he was in the pull off.
9. Detective Sergeant Jason Letourneau Crime Scene Search Team leader was assigned to process the crime scene. Members of the Crime Scene Search Team assisted Detective Sergeant Letourneau.
10. Detective Sergeant Letourneau advised that he identified the victim as Greg Davis DOB: 10/27/68 by an driver license found on his person. An autopsy was performed on 1/8/18. The Office of the Chief Medical Examiner has ruled this death a homicide.
11. A check of department records revealed Greg Davis DOB: 10/27/68 had a legal address of 884 Hawkins Road in Danville Vermont. Melissa Davis 5/15/78 was also found to be living at the same address.
12. Detective Sergeants Michael Nottle and Tyson Kinney met with Melissa at her residence and spoke with her. Detective Sergeant Kinney said Melissa stated that a male subject claiming to be a United States Marshal showed up at the residence at around 9 p.m. on 1/6/18. Melissa said the male subject claiming to be a US Marshal had silver chain handcuffs, a gun and was wearing a mask with one opening for the eyes and had an US Marshal emblem on the side. She also advised she observed a US Marshal emblem on the jacket. Melissa also advised that the car the subject showed up at their house had red and blue emergency lights were activated on the dash. Melissa told Detectives the male told Greg he had an arrest warrant for Racketeering and was going to bring Greg to Virginia. Melissa said Greg was not handcuffed in the house. Melissa told Detectives that the vehicle was a dark colored sedan.
13. Melissa told Detective Sergeants Kinney and Nottle that Greg was involved in Oil investing and got frustrated with his partners. Melissa said Greg had started to feel that his partners were engaged in fraudulent activity. Melissa advised Detectives that Greg had threatened to contact the F.B.I about the fraud. Melissa told Detectives that Greg started pursuing this investing partnership approximately 5-6 years ago. Melissa identified 2 lap tops and a desk top computer to Detectives. Detective Sergeant Nottle advised, Melissa told him the Apple computer in the house was used by Greg to communicate and conduct transactions for his investments.

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14. On 1/8/18 Detective Trooper Chris Pilner and I spoke with Sheryl Davis DOB: 9/13/48. Sheryl was identified as Greg's mother. Upon speaking with Sheryl, she advised she was told by Melissa what had happened. Sheryl's information was consistent with what Melissa told Detectives. In addition, Sheryl thought some of the partners and people involved had the first names of Omar, Robert and David and was not aware of last names. Sheryl said Greg was involved with a large transaction of \$180,000.00. Sheryl told me that Greg and David both got \$15,000.00 and Robert got \$150,000.00.
15. Through my experience, I am aware that most banking related to accounts can be done via cell phone or computer. These devices can have applications to maintain accounts and store data related to those accounts and the transactions or activity of the accounts. Detective Sergeant Kinney advised that there was a Wi-Fi router at the Davis home located at 884 Hawkins Road in Danville, VT. Through my experience, I know that devices such as smart phones, tablets, or other electronic devices with Wi-Fi capabilities may be search for a Wi-Fi source for connectivity. The router may keep data, logs and or information related to any Wi-Fi devices that tried to connect to the router located in the Davis home.
16. The scene where Greg Davis was located did have blood on and around the body. I know through my experience that firearms used in close proximity can cause blood spatter. Detective Sergeant Letourneau advised that it appeared an effort was made to cover the body of Greg Davis with snow. It is likely that there was biological transfer with bodily fluids such as blood, saliva or hair or fibers could be transferred, which could contain DNA. This transfer could be from Greg Davis to the suspect, or suspect to Greg Davis.
17. I am asking the honorable court to issue a search warrant for:

884 Hawkins Road in Danville Vermont, a two-story wood constructed single family home that is white in color, attached barn with 3 bay doors as well as garage and wood shed located directly across from the residence on the opposite side of Hawkins Road as well as any other out buildings associated with the property, rented by Greg C. Davis and Melissa L. Davis



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for the following property or object(s):

1. Any and all documents or records related to investing and personal banking, including but not limited to Oil/Gas investing, by Greg Davis, such as receipts, logs, transactions,



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notes, correspondence, financial institution information, contacts, names and contact information in any form including, digital form on computer, electronic devices and cell phones,.

2. Any biological fluids, blood, DNA, hairs and fibers for possible comparison.
  3. Any routers or other devices which have WIFI/internet capabilities
18. This investigation is ongoing. Limited information was released to the public regarding this case. The information regarding a male showing up claiming to be a Marshal as well as the description of the male, the clothing, vehicle used as well as reason for the arrest, how many times the victim was shot and how he was restrained was not released by the State Police. This information is vital and sensitive to the progress of this investigation. It is necessary for the police to verify the source of any information provided by a witness, and the public disclosure of the information contained in the search warrants would make such verification impossible. Public disclosure of the slightest detail would hinder the ability of the police to both identify potential suspects and to rule out any suspects that have been identified.
19. I respectfully request the Honorable Court to seal all documents related to this search warrant request because releasing said documents could hinder this investigation.
20. A search warrant for the above premise to search for the aforementioned items may be of material aid in the investigation of homicide.

Subscribed and sworn to before me on

This 8<sup>th</sup> day of January, 2018

[Signature]  
(Judicial Officer)

[Signature]  
(Affiant)  
1/8/18  
(Date)

1/8/18 @  
1901 hours

DATA ADMINISTERED BY TELEPHONE